

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

2014 DEC 24 A 11:30

CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA,

v.

JEFFREY STERLING,

Defendant.

Case No. 1:10-CR-00485

Hon. Leonie M. Brinkema

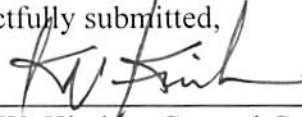
**MOTION OF NON-PARTY MICHAEL W. SHEEHY FOR PROTECTIVE ORDER**

Pursuant to Rule 47 of the Federal Rules of Criminal Procedure and Local Criminal Rule 47, potential trial witness Michael W. Sheehy – at all pertinent times Minority Staff Director and Chief Counsel for the Permanent Select Committee on Intelligence of the U.S. House of Representatives (“House Intelligence Committee” or “Committee”) – respectfully moves for a protective order barring the prosecution and defense from questioning him at trial about any Committee activities that fall outside the narrow scope of the testimony the Committee has authorized him to provide in this case.

On December 23, 2014, undersigned counsel conferred with Eric G. Olshan, Deputy Chief of the Public Integrity Section of the Criminal Division of the Department of Justice, and with Edward B. MacMahon, Jr. and Barry J. Pollack, counsel for the defense. Mr. Olshan advised that, while the prosecution does not concede the full scope of the Speech or Debate Clause as asserted herein, the prosecution does not oppose entry of the proposed protective order. Messrs. MacMahon and Pollack advised that the defense takes no position on the relief sought here.

A proposed order is submitted herewith, and oral argument is not requested.

Respectfully submitted,



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*Counsel for Non-Party Michael W. Sheehy*

December 24, 2014

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\* Attorneys in the Office of General Counsel for the U.S. House of Representatives are "entitled, for the purpose of performing the counsel's functions, to enter an appearance in any proceeding before any court of the United States . . . without compliance with any requirements for admission to practice before such court[]." 2 U.S.C. § 5571(a).

### CERTIFICATE OF SERVICE

I certify that on December 24, 2014, I served a copy of the foregoing Motion of Non-Party Michael W. Sheehy for Protective Order by first-class mail, postage prepaid, and by electronic mail (.pdf format) on each of the following:

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